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She drank the mixture and died. *Held*, the defendant is guilty of murder. *People v. Roberts* (Mich.), 178 N. W. 690.

At common law, suicide or self-murder is a felony. *State v. Levelle*, 34 S. C. 120, 27 Am. St. Rep. 799. But since the self-murderer himself was beyond the pale of human punishment, the common law sought to prevent the crime by attaching to it an ignominious burial in the highway with a stake driven through the body, and a forfeiture of goods. 4 BL. COM. 190. And if one counsel another to commit suicide, and the other, acting upon such advice, takes his own life, the adviser is guilty of murder. *Commonwealth v. Bowen*, 13 Mass. 356, 7 Ann. Dec. 154. By the old common law rule, if he was present at the commission of the act he was guilty of murder as a principal; but if he was absent he was a mere accessory before the fact, and since he could not be tried until the principal had first been tried and convicted, he escaped punishment. *Rex v. Russell*, 1 M. C. C. 356.

So also, if a person kills another upon the desire or command of the latter, he is guilty of murder; yet the person killed is not looked upon as a *felo de se*, for his assent, being contrary to law, is void. 1 RUSSELL, CRIMES, 8th Am. ed., 506. And if two persons agree to commit suicide together, and the means employed to procure death take effect upon one only, the survivor is guilty of the murder of the one who dies. *Blackburn v. State*, 23 Ohio St. 146; *Reg. v. Alison*, 8 Car. & P. 418.

In the principal case, however, there was no agreement or persuasion on the part of the defendant; he merely, at his wife's request and bidding, mixed the poisonous potion and placed it within her reach.

It is submitted that this decision is undoubtedly sound. The law has too high a regard for human life to suffer it to be lightly tampered with. It protects the lives of those to whom life is a burden as well as those in the full tide of life's enjoyment. *Blackburn v. State*, *supra*.

DAMAGES—LOSS OF USE OF GOODS—GOODS USED FOR PLEASURE PURPOSES ONLY.—The plaintiff owned an automobile which he used for both business and pleasure. It was damaged by the negligence of the defendant and was laid up ten days for repairs; the repairs costing \$80.50. During this time the plaintiff was deprived of its use, but did not hire another to take its place. He thereupon brought action for damages resulting from the defendant's negligence. The lower court awarded the plaintiff \$80.50 for the cost of repairs and also \$100.00 for the loss of the use of the machine for the ten days. The defendant appealed as to the award of the \$100.00. The appellate court conceded for the sake of argument that the car was used *solely* for pleasure purposes. *Held*, the plaintiff can recover. *Dettmar v. Burns Bros.*, 181 N. Y. Supp. 146. See NOTES, p. 141.

DESCENT AND DISTRIBUTION—RIGHT OF HUSBAND OR WIFE TO INHERIT FROM SPOUSE WHOM HE OR SHE HAS KILLED.—The plaintiff was convicted of manslaughter for killing her husband. The parties were domiciled in Kansas, and the conviction occurred in a court of that State. The